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Attorneys for Defendants Portfolio
Services Limited, Inc., Portfolio SE, Inc.
and Express Systems, Inc.

Attorney for Plaintiff Ja'Vonce Warre

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

JA'VONCE WARRE, an individual,

Plaintiff,

v.

PORTFOLIO SERVICES LIMITED, INC.,
a Texas corporation; **PORTFOLIO SE, INC.**, a
Texas corporation; and **EXPRESS SYSTEMS,**
INC., a California corporation,

Defendants.

Case No. 3:23-cv-00391-HZ

**JOINT MOTION FOR EXTENSION
OF TIME TO FILE FIRST
RESPONSIVE PLEADING**

I. L.R. 7-1 CERTIFICATION

Pursuant to L.R. 7-1, counsel for defendants Portfolio Services Limited, Inc., Portfolio SE, Inc., and Express Systems, Inc. ("**Defendants**") certify that they have conferred with counsel for

plaintiff Ja'Vonce Warre (“**Plaintiff**”), and counsel for plaintiff joins defendants in moving for the extension requested herein.

II. MOTION

The Parties move the Court for an Order extending the time to file Defendants’ first responsive pleadings by twenty-eight (28) days to June 15, 2023.

On March 17, 2023, Plaintiff commenced this action against Defendants by filing her Complaint with this Court. Defendants were served on April 27, 2023. The current deadline for Defendants to file their first responsive pleadings is May 18, 2023. Defendants’ counsel is promptly collecting and reviewing the relevant documents and materials in order to prepare their response to Plaintiff’s Complaint, but requests until and including June 15, 2023, to file their respective first responsive pleadings.

On May 10, 2023, counsel for Defendants conferred with counsel for Plaintiff, who indicated that Plaintiff joins in Defendants’ requested extension. There are no status conferences or hearings that will be affected by this motion. This is the first request for an extension. This request is made for good cause, in good faith and not for the purpose of causing unwarranted delay.

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III. CONCLUSION

For the reasons stated above, the Parties respectfully request that this Court grant the Parties' Motion and extend the deadline for Defendants to respond to Plaintiff's Complaint to June 15, 2023.

Dated: May 15, 2023.

DUNN CARNEY ALLEN HIGGINS &
TONGUE LLP

/s/ Joshua D. Stadtler

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